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22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA
24 SAN FRANCISCO DIVISION

25 MAXIMILIAN KLEIN, et al., on behalf of
26 themselves and all others similarly situated,

27 Plaintiffs,

28 v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**REPLY DECLARATION OF MOLLY M.
JENNINGS IN SUPPORT OF META
PLATFORMS, INC.'S MOTION TO
EXCLUDE TESTIMONY OF KEVIN
KREITZMAN AND MICHAEL A.
WILLIAMS**

Judge: Hon. James Donato

1 I, Molly M. Jennings, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this reply
4 declaration in support of Meta's Motion to Exclude Testimony of Kevin Kreitzman and Michael
5 A. Williams.

6 2. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from Tim
7 Koller, et al., *Valuation: Measuring and Managing the Value of Companies* (7th ed. 2020).
8 Another excerpt of this book was attached as Exhibit 4 to the Declaration of Amanda F. Lawrence
9 in Support of Advertiser Plaintiffs' Opposition to Motion to Exclude Testimony of Dr. Michael
10 Williams and Kevin Kreitzman. Dkts. 680-1, 680-5.

11 3. Attached hereto as Exhibit 12 is a true and correct copy of additional excerpts from
12 the transcript of the deposition of Michael A. Williams, Ph.D., held on September 26, 2023. Other
13 excerpts from this transcript were previously submitted as Exhibit 3 to my first declaration in
14 support of this Motion. Dkts. 662-1, 661-4.

15 4. Attached hereto as Exhibit 13 is a true and correct copy of additional excerpts from
16 the transcript of the deposition of Kevin Kreitzman, held on October 2, 2023. Other excerpts from
17 this transcript were previously submitted as Exhibit 6 to my first declaration in support of this
18 Motion. Dkts. 662-1, 661-7.

19 5. Attached hereto as Exhibit 14 is a true and correct copy of an excerpt from the
20 consolidated financial statements of Wirtualna Polska Capital Group for the year ending December
21 31, 2020.

22 6. Attached hereto as Exhibit 15 is a true and correct copy of an excerpt from the
23 Expert Report of Michael A. Williams, dated October 11, 2022 and filed at Dkt. 959-1 in the matter
24 *In re Hard Disk Drive Suspension Assemblies Antitrust Litigation*, No. 3:19-mc-02918-MMC
25 (N.D. Cal.).
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2 I declare that the foregoing is true and correct under penalty of perjury.

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4 Executed on this 3rd day of November, 2023, in Washington, District of Columbia.

5 By: /s/ Molly M. Jennings

6 Molly M. Jennings
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SIGNATURE ATTESTATION

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from the signatory.

By: /s/ Sonal N. Mehta
Sonal N. Mehta